

### **REMARKS**

Claims 16-30 were rejected in the Official Action mailed October 27, 2006. In response, Applicant respectfully requests reconsideration. In this Response After Final, no claims are amended, added or canceled. No new matter has been added.

#### **I. Rejections Under 35 U.S.C. § 102**

Claims 16-18, 20-22, and 24-26 were rejected as being allegedly anticipated by *Meyer* (U.S. Patent Publication No. 2001/0037417). Claims 16-18, 20-22, 24-26, and 28-30 were rejected as being allegedly anticipated by *Nevarez et al.* (U.S. Patent No. 6,609,158, hereinafter "*Nevarez*"). Applicant respectfully traverses these rejections.

Neither *Meyer* nor *Nevarez* teaches every limitation of claims 16, 20, and 24. Those claims recite a connect module having "a call parameter data structure for storing call parameters and return values." The Examiner contends that *Meyer* teaches this limitation at paragraphs 50 and 51, noting that "Proxy 130 converts any parameters in the call to call parameters for second execution environment 150 using a type description" and that "Proxy 130 converts the result and any parameters returned from the second execution environment 150 to first execution environment 120." While Applicant recognizes the existence of call parameters and return values in *Meyer*, nowhere in the cited passages does *Meyer* disclose anything relating to a data structure for storing both the call parameters and return values. In that way, the call parameter details may be completely hidden from the caller. Likewise, *Nevarez* discloses the existence of call parameters and return values, but does not even mention in the cited passages a data structure as recited by the claims. See column 10, lines 38-55 of *Nevarez*. "A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Applicant respectfully submits that neither *Meyer* nor *Nevarez* teaches this limitation. If the rejection is maintained, Applicant requests that the Examiner specifically identify what the Examiner regards as a "data structure."

Accordingly, Applicant requests withdrawal of the rejection and allowance of the pending claims. Claims 17, 18, 21, 22, 25, 26, and 28-30 depend from claims 16, 20, and 24, and are therefore patentable for at least the same reasons.

**II. Rejection Under 35 U.S.C. § 103**

Claims 19, 23, and 27 were rejected under 35 U.S.C. §103(a) as being allegedly unpatentable over *Nevarez* in view of *Drapeau* ("Project Blackwood: Integration of the Java Platform with Mozilla"). Applicant respectfully traverses the rejection.


Independent claims 16, 20, and 24 are not allowable over *Nevarez* as discussed above. *Drapeau* still fails to disclose or suggest that limitations that are absent in *Nevarez*. Applicant respectfully submits the rejection has been overcome and requests that it be withdrawn.

**III. Conclusion**

Applicant respectfully submits that claim 16-30 are allowable over the cited prior art, and respectfully requests early and favorable notification to that effect.

Respectfully submitted,

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